

MCI WORLD COM

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September 20, 1999

Ex Parte Submission

Hon. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: *In the Matter of Applications for Consent to the Transfer of Control of
Licenses and Section 214 Authorizations from Ameritech Corporation,
Transferor, to SBC Communications Inc., Transferee, CC Docket No. 98-141 /*

Dear Ms. Salas:

The proposed merger of SBC and Ameritech is fundamentally anticompetitive and contrary to the public interest, and their application should be unconditionally denied. MCI WORLD COM, Inc. ("MCI WorldCom") previously demonstrated that (1) no set of conditions can ensure that the prospects for local competition are enhanced and that competition for Internet services is preserved if the two companies merge, and (2) the conditions initially proposed by SBC and Ameritech are not effective or enforceable, and do not come close to generating public interest benefits sufficient to offset the basic anticompetitive effects of the merger. *See* MCI WorldCom's Comments on Possible Conditions (filed July 19, 1999) ("MCI WorldCom Comments").

On August 27 and September 7, 1999, SBC and Ameritech offered some changes to their proposed merger conditions. But they only tinker at the margins with their initial proposal, failing to solve, or even for the most part to address, its fundamental defects. The same overarching concerns (*see* MCI WorldCom Comments, at 6-11) continue to apply to virtually all of SBC and Ameritech's proposed conditions:

- First and foremost, all of the conditions should be pre-conditions — SBC and Ameritech should be required to prove to the Commission's satisfaction that they have met all of the conditions *before* they transfer control of any licenses.
- SBC and Ameritech still refuse to condition any transfer of control on grants of authority under section 271 to provide interLATA service in at least a majority of their in-region states, as several state attorneys general have advocated.

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- Critical conditions, including the collocation, unbundled network element (“UNE”), and pricing conditions do little more than require SBC and Ameritech to obey existing federal and state regulations, in effect rewarding their on-going failure to live up to their legal obligations.
- The proposed enforcement mechanism still is ineffective and protracted, and remedies for non-compliance inadequate. The Commission would have to devote substantial resources to the enforcement of these conditions even with the revisions, and the allocation of authority between this Commission and state commissions remains uncertain.
- The conditions are still subject to an arbitrary sunset date that creates incentives for non-compliance, and the conditions should remain in effect until SBC/Ameritech demonstrates that the conditions have in fact outlived their usefulness.
- None of the proposed conditions addresses either the threat to Internet competition posed by the proposed merger, or the issue of inflated access charges.

The remainder of this submission discusses continuing flaws in each of the conditions proposed by SBC and Ameritech (using their revised numbering of the proposed conditions). MCI WorldCom addresses only those proposed conditions that SBC and Ameritech have shown at least some willingness to modify. MCI WorldCom does not repeat here all of the problems with the initial proposal that it identified in its initial comments, which it incorporates by reference.

The introductory portion of the proposed conditions now provides that they do not limit or affect the authority of state commissions to adjudicate disputes about SBC/Ameritech’s compliance with federal or state legal requirements that state commissions have jurisdiction to enforce. This is a step in the right direction. However, the respective roles of this Commission and state commissions are left undefined. Any conditions should constitute a floor that permits state commissions to impose stronger or more comprehensive requirements, and the Commission should affirmatively encourage state commissions to do so, especially to the extent that a condition is less procompetitive than any equivalent requirement in any state, whether adopted as a state merger condition or otherwise.

MCI WorldCom also notes that SBC and Ameritech completely eliminated the general pricing condition that it initially proposed. Elimination of this condition is not harmful because it was merely window dressing. *See* MCI WorldCom Comments, at 49-51. However, the result is that the proposal does nothing to address current problems with SBC and Ameritech’s recurring and nonrecurring charges for UNEs and resold service. SBC and Ameritech chose not to offer any useful price-related condition, for example, one that provides for prompt Commission adjudication of complaints about violations of its own rules under its expedited procedures, or

that imposes caps on the prices of specific recurring and non-recurring charges for UNEs and prohibits “glue charges” for combinations of UNEs. *Id.* at 50-51.

I. STRUCTURAL SEPARATION FOR ADVANCED SERVICES

SBC and Ameritech’s proposal continues to incorporate their untenable position that an advanced services affiliate would not be subject to the same unbundling, resale, and nondiscrimination requirements of section 251(c) that indisputably apply to the ILEC affiliate. That position is legally unsustainable with respect to any affiliate, and especially with respect to an affiliate that would enjoy all of the discriminatory advantages that SBC and Ameritech’s proposal would confer on the advanced services affiliate. Any waiver of section 251(c) requirements for the advanced services affiliate cannot lawfully be incorporated in any conditions. MCI WorldCom Comments, at 40-41. Although the Commission has not yet issued its order, MCI WorldCom understands that the Commission determined in the UNE remand proceeding that ILECs will not be required, at least in some circumstances, to provide certain network elements relating to advanced services on an unbundled basis. To the extent that SBC/Ameritech’s ILEC affiliate is not subject to section 251(c) requirements, neither would its advanced services affiliate. But although the advanced services affiliate would not be subject to any section 251(c) requirements that do not apply to the ILEC affiliate, the ILEC affiliate may not avoid any of its section 251(c) obligations by transfer or assigning any local exchange or exchange access functions to an advanced services affiliate.

SBC and Ameritech make some modest incremental improvements in the separation requirements, but the proposed degree of separation is still insufficient because it allows the ILEC affiliate to perform a broad range of functions that unaffiliated providers of advanced services perform for themselves. Moreover, policing day-to-day compliance with these complex conditions would consume large amounts of Commission, and competitive local exchange carrier (“CLEC”), resources. The *ex post* audit described in paragraph 67 cannot as a practical matter ensure that each of the thousands of myriad daily interactions between the ILEC and advanced services affiliates complies with the formal separation and nondiscrimination principles.

At a minimum, the proposal should be strengthened or clarified in several important respects:

- SBC and Ameritech should be required to provide advanced services through affiliates that meet all of the separation and nondiscrimination requirements *before* they may complete the merger. MCI WorldCom Comments, at 42.
- The ILEC should not be permitted to provide to the affiliate even temporarily any advanced services functionality, to share the same space as the affiliate, to allow the affiliate to use its brand name, to transfer equipment or customers to the affiliate, to market advanced services provided by the affiliate, or provide customer care, installation, testing, and billing and collection functions. The ILEC affiliate should also not be allowed

to provide line sharing to the advanced services affiliate on a discriminatory basis, and for an indefinite period. The ILEC and the affiliate should be required (not merely permitted) to separately own and maintain advanced services equipment. *See MCI WorldCom Comments*, at 43, 45.

- The Commission should establish an expedited procedure to resolve any issue about SBC/Ameritech's compliance with the separation requirements, and it should define self-executing remedies for such violations, including loss of the purported section 251(c) exemption. *MCI WorldCom Comments*, at 45.
- The definition of advanced services in paragraph 2 should be narrowed consistent with the Commission's definition based on a capability of 200 kbps in both directions.

II-V. OTHER PROVISIONS RELATING TO ADVANCED SERVICES

SBC and Ameritech propose no significant improvements to other aspects of their flawed proposal concerning advanced services:

- The discount for unbundled loops if SBC and Ameritech do not develop necessary OSS (paragraph 18) remains inadequate, although they have applied the discount to non-recurring as well as recurring charges. *See MCI WorldCom Comments*, at 44.
- With respect to Condition IV, SBC/Ameritech should complete deployment of OSS for loop pre-qualification information, and provide nondiscriminatory, electronic pre-order Internet access to loop pre-qualification information for xDSL services, in all states prior to closing. *MCI WorldCom Comments*, at 35, 37-38. Paragraph 20 should be strengthened to make unambiguously clear that SBC and Ameritech shall provide, through nondiscriminatory electronic OSS, all of the information that they state is "typically" contained in loop records (including specific loop lengths, and not merely ranges), so that CLECs can compete effectively to provide all kinds of DSL and other advanced services.
- SBC/Ameritech still dodge the critical issues associated with spectrum management. *MCI WorldCom Comments*, at 38.
- In apparent recognition of the excessiveness of the interim loop conditioning rates they initially proposed (*MCI WorldCom Comments*, at 38-40), SBC and Ameritech now simply promise in Condition V to submit cost studies six months after the merger close. This is merely a promise to obey the law — and then only on a delayed basis.
- SBC and Ameritech should commit categorically to provide line sharing by a date certain, or at least to provide it to unaffiliated CLECs on a nondiscriminatory basis at the same time it provides line sharing to its advanced services affiliate. *MCI WorldCom Comments*,

at 45. SBC and Ameritech should be prohibited from imposing on CLECs any use or other restrictions on channels leased in a line-sharing arrangement.

VII. PERFORMANCE MEASURES AND REMEDIES

With the revisions, SBC and Ameritech's proposed plan for performance measures and remedies for non-compliance still does not go nearly far enough. The criteria are incomplete and inadequate, and the purportedly self-executing remedies are insufficient. These inadequacies are especially dangerous because SBC and Ameritech will continue to argue, as Ameritech already has, that state commissions should not adopt "inconsistent" plans despite the provision that the proposed conditions would not supersede stronger state plans. MCI WorldCom Comments, at 11.

The Commission should not settle for the measures proposed by SBC and Ameritech. These measures do not meet the nondiscrimination requirements of the 1996 Act and indeed fall short of the measures adopted in several states, including certain SBC or Ameritech states. MCI WorldCom submitted as Attachment 1 to its initial comments on SBC and Ameritech's initial proposal a complete and comprehensive measurement plan — Measurements and Performance Standards ("MPS"). If the Commission does not adopt this plan, the Commission should, at a minimum, replace the proposed measure with the strongest, most effective measure already implemented or ordered in another state, using the benchmarking approach that the proposed merger would undermine. For example, the plan adopted by the California commission is in many respects stronger than the plan proposed by SBC and Ameritech in this proceeding, and SBC and Ameritech provide no justification for watering down even the California plan. SBC and Ameritech should meet in all of their states the same standards that they will meet in California or any other state that has adopted the strongest measure. State commissions outside their regions have adopted, or are nearing finalization of, tougher and more complete measures, including measures that address issues not covered by the SBC and Ameritech proposal.

Attachment 1 to this letter summarizes needed improvements that for the most part have been adopted by one or more states (as indicated in the Attachment) and that are consistent with this Commission's April 1998 Notice of Proposed Rulemaking on performance measurements issued on April 17, 1999, in CC Docket No. 98-56. Attachment 1 also lists additional measures that should be added to the merger conditions. Attachment 2 contains a more detailed comparison of the performance measures proposed by SBC and Ameritech as merger conditions, those adopted by the California Public Utilities Commission, and those adopted by the Michigan Public Service Commission.

Most of the specific illustrative deficiencies identified in MCI WorldCom's Comments (at 13-16) remain uncorrected. Some of these defects include: incorrect use of a statistical test in addition to a benchmark when a standard is used to measure compliance with a performance yardstick (MCI WorldCom Comments at 17-18); failure to use the modified z-test for all parity measurements, whether they are expressed as a means, percentage, proportions, or rates, or

permutation for sample sizes of less than 30 (*id.* at 18); bias to excuse inferior service (*id.* at 18-20); and lack of monthly reporting on special access and switched access service quality for CLECs and remedies for substandard performance (*id.* at 24). SBC and Ameritech still do not explain how they will collect the data, nor do they provide for CLEC input concerning any subsequent proposal by SBC/Ameritech to modify any performance criteria that the Commission has imposed as a merger condition in Paragraph 4 of Attachment A. *Id.* at 24-25. SBC and Ameritech would still not be required to implement all of performance standards and measures before they close on the merger, and to do so in all SBC and Ameritech states, including Connecticut. *Id.* at 20.

Equally important, the remedy amounts are still far too low to discourage SBC/Ameritech from providing substandard service to CLECs. MCI WorldCom Comments, at 20-24. SBC and Ameritech have revised this condition so that the voluntary payments for poor performance would now be paid only to the U.S. Treasury, rather than paid to the CLECs. Failure to meet these performance standards harms CLECs, and any system of self-executing remedies should provide compensation to individual CLECs. If their proposal is accepted, SBC/Ameritech can be expected to argue that it should pay less to CLECs for substandard performance because of the substantial payments it is making to the federal government. In addition, payments should be made when SBC/Ameritech provides inadequate service in any month, and not only after three months of bad service. Indeed, SBC and Ameritech get it backwards when they increase the payments for poor performance with respect to facilities and services ordered by CLECs at low volumes, but retain the same inadequate penalties for tasks on which CLECs must continuously rely for mass market services. Instead of eliminating all monetary caps from the plan, SBC and Ameritech merely increase them by a relatively nominal amount.

SBC and Ameritech also propose that any of the payments it makes for poor performance pursuant to these merger conditions should be reduced by other payments SBC and Ameritech are required to make under any state performance plans or interconnection agreements. MCI WorldCom believes that, because remedy amounts proposed by SBC and Ameritech are too low already, there should not be any allowance for an offset of amounts owed for poor performance.

MCI WorldCom continues to be concerned that SBC and Ameritech's proposal for stronger remedies at the end of a three-year period means that the remedies are inadequate at the beginning of that period when CLECs are likely to be even more vulnerable to inadequate performance by SBC/Ameritech. A scheme under which the remedies are higher in the third year and lowest in the first year would provide less effective deterrence and compensation during the early and most critical stages of competition.¹ At a minimum, SBC and Ameritech should adopt the Texas per-measure remedy levels for all metrics, and not provide for per-occurrence remedies until the per-occurrence remedies are such that they would create a greater level of consequences

¹See *Effective Enforcement of Non-Discriminatory Performance by Incumbent Local Exchange Carriers* by George S. Ford, MCI WorldCom and Dr. John D. Jackson, Auburn University, submitted *ex parte* on August 20, 1999, in CC Docket Nos. 98-121 and 98-56.

for poor performance than the per-measure amounts.² The high, medium, and low rankings should apply based on the magnitude of the miss and not the metric type. SBC and Ameritech's proposed remedies are not proportionate to the magnitude of the problem (for example, greater consequences for longer delays of orders or repairs).

Finally, SBC/Ameritech's obligation to comply with the performance-related conditions should not expire when it gets section 271 authority within a state. The need for SBC/Ameritech to provide reasonable and nondiscriminatory service to CLECs will be, if anything, greater when it also provides in-region interLATA services, and safeguards against backsliding need to remain in place.

VIII. UNIFORM AND ENHANCED OSS

SBC and Ameritech make some appropriate changes in their proposed conditions concerning Operations Support Systems ("OSS"). For example, SBC and Ameritech commit to provide compliant OSS for a minimum of three years after deployment (paragraph 33), unlike their initial proposal in which the condition was likely to sunset before SBC/Ameritech complied with it. However, the proposal still does not ensure that SBC and Ameritech begin to comply within a reasonable time because Phases 1, 2, and 3 are unnecessarily protracted (paragraphs 28 and 31), and the remedies for non-compliance are still capped at insufficient levels. The best approach would be to require full compliance with the uniform interface requirements before SBC and Ameritech close. See MCI WorldCom Comments, at 28-29, 32. In addition, SBC and Ameritech incorrectly continue to fail to include SORD as a necessary component of uniform interfaces as described in paragraph 29. SORD is software for a necessary core ordering OSS function and should be included in the plan for developing and deploying interfaces for OSS, as defined in paragraph 28.

MCI WorldCom also urges the Commission to clarify that the interface must be able to process the same use case scenarios (or transactions). It is not enough that the interface comply with industry standards because industry standards, and particularly the LSOG, leave many variables within the specification as "optional". This could yield thousands of possible OSS implementation permutations and create an opposite result from the intent of the uniform OSS condition - to establish one uniform interface.

Equally important, design, development, testing, and deployment of OSS and associated business rules ought to be consolidated into one comprehensive plan, subject to Commission review and approval before any closing. See *id.* at 29-31. The proposal now properly includes data format specifications and transport and security protocols as part of uniform interfaces, but it still inappropriately treats business rules as something separate from uniform interfaces, and puts

²See The Texas 271 Agreement ("T2A") Project 16251 *Investigation into Southwestern Bell Telephone Companies Entry into the InterLATA Telecommunications Market* (Filed August 30, 1999).

them on a separate development and deployment schedule. The term “business rules” itself in paragraph 31 should also include business functionality, fields, and valid values.

The change management process should also be finalized before any merger close, and with input from all interested parties. *Id.* at 33-34. If CLECs cannot effectively use the OSS interface after it is made uniform because SBC and Ameritech have not complied with an adequate change management process, the harm to competition could be significant.

Another major flaw continues to be the absence of independent third-party and carrier-to-carrier testing of the full spectrum of OSS functions. *Id.* at 33. Without testing, there is no assurance that the OSS interfaces actually work or are in fact uniform across the regions.

The arbitration process continues to be skewed in SBC/Ameritech’s favor because SBC/Ameritech selects the arbitrator, subject only to approval by the Chief of the Common Carrier Bureau. As a result, the arbitrator will be acceptable to SBC/Ameritech, but not necessarily to CLECs. As several states have done, SBC/Ameritech and CLECs should each select one arbitrator, and those two arbitrators should select the third arbitrator. Or the Chief of the Common Carrier Bureau should select the arbitrator from lists of arbitrators proposed by both SBC/Ameritech and CLECs.

XI. COLLOCATION COMPLIANCE

With respect to collocation, SBC and Ameritech still essentially offer nothing more than to comply at some time with their existing legal obligations. *See* MCI WorldCom Comments, at 25-27. No transfer of licenses should occur unless and until the Commission — not the auditor picked by SBC and Ameritech — finds that SBC and Ameritech have fully implemented the Commission’s collocation rules. SBC and Ameritech’s modest changes in the audit process do not go nearly far enough. For example, paragraph 39 permits SBC and Ameritech to hand-pick the auditor subject to acceptance by the Commission based on unidentified criteria, and paragraph 40 does not provide for adequate input into the compliance process by CLECs, the entities most directly affected by violation of the Commission’s collocation rules.

SBC and Ameritech now propose a limited remedy for one type of non-compliance with the Commission’s rules: if SBC/Ameritech misses a collocation due date by more than 60 calendar days, it will waive, credit or refund nonrecurring collocation costs. However, SBC/Ameritech still retains total control over the scheduling of the due date, grants itself a 60-day grace period, and limits its exposure to nonrecurring charges which should constitute a decreasing portion of total charges. The conditions should provide for comprehensive consequences for non-compliance and make compliance a pre-condition to the transfer of control. *See* MCI WorldCom Comments, at 27.

XII. MOST-FAVORED-NATION PROVISIONS

Despite some modest improvements, the most-favored-nation provisions would simply start a lengthy negotiation process in which SBC and Ameritech would resist providing parity based on claims of technical infeasibility and inflated prices. *See* MCI WorldCom Comments, at 55. The new provision for a “true-up” with respect to pricing is useful, but still exposes CLECs to major economic uncertainty that deters investment. In addition, contrary to the first sentence in paragraph 42, an SBC/Ameritech ILEC should have the same obligation as ILECs not affiliated with SBC/Ameritech to make available to unaffiliated LECs service arrangements developed for an SBC/Ameritech affiliate at the SBC/Ameritech affiliate’s request.

XIV-XVI. CARRIER-TO-CARRIER PROMOTIONS

The carrier-to-carrier promotions offered by SBC and Ameritech are still saddled with crippling limitations and restrictions that render them at best largely useless. *See* MCI WorldCom Comments, at 51-54. For example, SBC/Ameritech would impose strict caps on the availability of the promotions and limit them to recurring charges. The so-called “discount” for the UNE platform is still left completely to negotiation and arbitration. Even more importantly, MCI WorldCom emphasizes that the “discount” on the UNE platform may not be a discount at all because paragraph 51.c instructs state commissions to set a price for the UNE platform “in accordance with the pricing rules that apply to UNEs pursuant to” section 251(d)(1). Of course, those rules require rates to be based on cost — not set at discounts below cost. As a result, the proposal appears to permit SBC/Ameritech to attach facially discriminatory and anticompetitive restrictions on the availability of UNE platform combinations provided at cost-based prices. Among these unlawful restrictions are limitations on the services that the platform can be used to provide, on the total number of combinations made available to CLECs, and on the length of time the platform is available. Accordingly, the Commission should remove any restrictions on the availability of UNE combinations at cost-based rates.

XVII. OFFERING OF UNEs

The modified proposed condition, by its terms, still does not improve the status quo and at best reiterates prior commitments by SBC and Ameritech. *See* MCI WorldCom Comments, at 48-49. By its express terms, it requires SBC and Ameritech only to continue to provide UNEs “under the same terms and conditions that such UNEs or combinations of UNEs were made available on January 24, 1999”— no matter how unreasonable and discriminatory those terms and conditions were. In light of the Commission’s decision in the UNE remand proceeding, this proposed condition may result only in more confusion and more opportunity for litigation by SBC and Ameritech.

XIX. SHARED TRANSPORT IN AMERITECH STATES

SBC and Ameritech make no material improvements in their deficient proposed condition concerning shared transport, and in fact add qualifiers intended to protect their interests. *See* MCI WorldCom Comments, at 46-48.

XX. ACCESS TO CABLING IN MULTI-UNIT PREMISES

Here again, SBC and Ameritech only tinker at the margins and fail to address the fundamental defects of their proposal. In particular, they should not merely conduct a cabling trial but should provide, on a permanent basis, nondiscriminatory access to cabling within MDUs and MTUs where they control the cables, and SBC and Ameritech should comply with this requirement before they close. *See* MCI WorldCom Comments, at 56-57.

XXI. OUT-OF-REGION LOCAL SERVICES

The proposed conditions relating to out-of-region local services remain essentially unchanged (for example, the initial deployment deadline in paragraph 59.c now requires service to three instead of one unaffiliated customer) — and essentially meaningless. If marketplace conditions do not create adequate incentives for a company to make the substantial investments necessary to be a competitive facilities-based local exchange carrier, the Commission cannot supply these incentives through a regulatory set of conditions, much less one with a strict cap on SBC/Ameritech's potential exposure. *See* MCI WorldCom Comments, at 58-59.

XXIV. ADDITIONAL SERVICE QUALITY REPORTING

The service quality reporting conditions add little value. The problem is not whether the data is available on SBC/Ameritech's website, but that the reporting requirements are unnecessarily delayed and incomplete. *See* MCI WorldCom Comments, at 55-56.

XXVII. INDEPENDENT AUDITOR

SBC and Ameritech make few of the changes that MCI WorldCom proposed to improve the audit process. *See* MCI WorldCom Comments, at 59-60. In particular, SBC/Ameritech's authority to select the auditor should be more circumscribed, and parties that disagree with the auditor's findings should have an opportunity to submit their objections and obtain a Commission ruling on an expeditious basis.

XXVIII. ENFORCEMENT

SBC and Ameritech still fail to acknowledge expressly that the Commission has authority and jurisdiction to enforce these merger conditions. MCI WorldCom understands that the new statement in paragraph 68 that "[t]he specific enforcement mechanisms established by these Conditions do not abrogate, supersede, or otherwise replace the Commission's powers under the Communications Act" means that these conditions do not affect the Commission's authority, and its obligation, to adjudicate complaints pursuant to section 208 of the Communications Act.

The enforcement section still fails to provide for payments for violation of those conditions for which no specific non-compliance payment is provided, and to provide for

payments of attorneys' fees and other costs in any enforcement proceeding where SBC/Ameritech's opponents substantially prevail. *See* MCI WorldCom Comments, at 62. Contrary to the approach in paragraph 69 that permits the Commission "at its discretion" to extend the effective period of a condition for a period that does not exceed any period of non-compliance, any condition with which SBC/Ameritech does not comply should be automatically extended for the period of non-compliance. *See id.* at 62. The modification provision in what is now paragraph 72 should be changed substantially. *See id.* at 62-63.

XXIX. SUNSET PROVISIONS

There should be no automatic sunset of any of the conditions. *See* MCI WorldCom Comments, at 63-64. If the Commission nonetheless decides to adopt an arbitrary sunset date, it should, at a minimum, make the four critical changes previously recommended by MCI WorldCom. *Id.* at 64.

XXX. EFFECT OF THE CONDITIONS

Paragraph 75 remains unclear and could be abused by SBC/Ameritech to evade procompetitive conditions imposed by the Commission. For example, the Commission should more clearly define when a merger condition imposed by it is "substantially related" to a merger condition imposed under state law. *See* MCI WorldCom Comments, at 65. What is now paragraph 76 would still unjustifiably circumscribe the Commission's public interest review under section 271(d)(3)(C). *See id.* at 65.

* * * * *

In conclusion, no set of conditions can adequately offset the substantial harms to the public interest that the merger of SBC and Ameritech would cause. If the Commission nevertheless decides to grant conditional approval to the merger, it should substantially strengthen the conditions proposed by SBC and Ameritech as explained in MCI WorldCom's initial comments and in this submission.

Respectfully submitted,



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ATTACHMENT 1

MCI WORLDCOM'S RECOMMENDED IMPROVEMENTS TO THE SBC/AMERITECH MERGER MEASURES

NEEDED IMPROVEMENTS TO MEASURE 1: FOC INTERVAL

- For orders where an order confirmation notice is not returned to the CLEC, the interval should be measured using the date/time CLEC receives completion notice. (Bell Atlantic-New York)
- Include additional service group types:
 - UNE loops by type of loop. (Pac Bell-California)
 - UNE Transport, UNE Combinations, and Interconnection trunks. (Pac Bell-California)
 - All service requests regardless of line size. (Ameritech-Michigan, BellSouth-Georgia, Southwestern Bell Telephone-Texas)
- Disconnects should not be excluded, but rejects should. (Pac Bell-California, Ameritech-Michigan)
- As much as possible, projects should be included. (Southwestern Bell Telephone-Texas, Ameritech-Michigan)
- Make the standard for the measure parity, or a benchmark as appropriate, depending on the interface. Benchmarks to be reviewed periodically. (Pac Bell-California, BellSouth-Georgia)

NEEDED IMPROVEMENTS TO MEASURE 2: AVERAGE RESPONSE TIME FOR OSS PRE- ORDER INTERFACES

- Measure for all pre-order query types including loop qualification and reject/failed queries. (Pac Bell-California, Bell Atlantic-New York, BellSouth-Georgia)
- Make the standard for the measure parity, at least for the portion of the transaction in ILEC legacy systems, or a benchmark, as appropriate, depending on the interface. Benchmarks to be reviewed periodically. (Pac Bell-California, Ameritech-Michigan, BellSouth-Georgia)
- Include all pre-order interfaces in the measure and as new interfaces or pre-order query types are implemented, require reporting on them within 4-6 weeks. (Pac Bell-California, Bell Atlantic-New York)
- Define CSR response as including entire customer record, not just summary. (Pac Bell-California, Ameritech-Michigan, BellSouth-Georgia)
- Broaden OSS response processes to include Maintenance and Repair Queries.

(BellSouth-Louisiana, Bell Atlantic-New York, Bell Atlantic-Pennsylvania, Bell Atlantic-New Jersey)

NEEDED IMPROVEMENTS TO MEASURE 3: ORDER PROCESS PERCENT FLOW THROUGH

- Measure for all electronically received orders. (i.e., not just those programmed to flow through). (Pac Bell-California)
- Measure by interface type. (Pac Bell-California)
- Make the standard for the measure parity. (Ameritech-Michigan, Southwestern Bell Telephone-Texas)

NEEDED IMPROVEMENTS TO MEASURE 4a, 4b, 4c: PERCENT ILEC CAUSED MISSED DUE DATES

- Redefine measurement interval so that end time is when the completion notice is sent to CLEC, not when the order is noted as complete in the ILEC provisioning system (Ameritech-Michigan, BellSouth-Georgia, Bell Atlantic-Pennsylvania ALJs' Recommendation)
- Measure should be based on orders, not circuits. (Pac Bell-California, Ameritech-Michigan, BellSouth-Georgia)
- Include interconnection trunks in the service type list. (Pac Bell-California, Ameritech-Michigan, BellSouth-Georgia, Southwestern Bell Telephone-Texas)
- Orders canceled before due date is missed, customer caused misses, and disconnect orders should be excluded. (Pac Bell-California, BellSouth-Georgia)

NEEDED IMPROVEMENTS TO MEASURE 4d: PERCENT MECHANIZED COMPLETIONS RETURNED WITHIN 1 DAY

- Measure for all interfaces, including manual. (Pac Bell-California, Ameritech-Michigan, BellSouth-Georgia)
- Establish a benchmark of at most an average of 20 minutes for return of fully electronic completion notices, evolving to real time return. (Pac Bell-California, Bell Atlantic-Pennsylvania ALJs' Recommendation of 15 minutes)

NEEDED IMPROVEMENTS TO MEASURE 5a, 5b, 5c: PERCENT OF TROUBLE REPORTS WITHIN 10 (30) DAYS OF INSTALLATION

- Change the measurement interval to 30 days for all service types. (Pac Bell-California, Ameritech-Michigan, BellSouth-Georgia, Bell Atlantic-New York)
- Include interconnection trunks in the measure. (Pac Bell-California, Ameritech-Michigan, BellSouth-Georgia)
- Include number portability troubles. (Pac Bell-California, Bell Atlantic-New York, Southwestern Bell Telephone-Texas)
- Report by region. (Pac Bell-California)

NEEDED IMPROVEMENTS TO MEASURE 6a, 6b, 8: MEAN INSTALLATION INTERVAL

- Redefine measurement interval so that end time is when the completion notice is sent to CLEC, not when the order is noted as complete in the ILEC's provisioning system. (Ameritech-Michigan, BellSouth-Georgia, Bell Atlantic-Pennsylvania ALJs' Recommendation)
- Include UNEs in the service type list. (Pac Bell-California, Ameritech-Michigan, BellSouth-Georgia)
- Break out UNEs by loop types and combinations. (Pac Bell-California)
- Include UNE-Transport in the service type list. (Pac Bell-California, Ameritech-Michigan)
- Break out UNE-Transport by transmission speed.
- Include interconnection trunks in the service type list. (Pac Bell-California, Southwestern Bell Telephone-Texas, Ameritech-Michigan, BellSouth-Georgia)
- Report by region. (Pac Bell-California)
- Redefine exclusions so that all customer requested due dates other than offered interval are excluded. (Pac Bell-California)

NEEDED IMPROVEMENTS TO MEASURE 6c: PERCENT INSTALLATIONS COMPLETE IN X DAYS

- Redefine measurement interval so that end time is when the completion notice is sent to CLEC, not when the order is noted as complete in the ILEC's provisioning system. (Ameritech-Michigan, BellSouth-Georgia, Bell Atlantic-Pennsylvania ALJs' Recommendation)
- Include Resale Specials and Interconnection Trunks in the service type list. (Pac Bell-California, BellSouth-Georgia)

- Break out UNEs by loop types and combinations. (Pac Bell-California)
- Report by region. (Pac Bell-California)
- Include Design Layout Records. (Bell Atlantic-New York, Bell Atlantic-Pennsylvania, Bell Atlantic-New Jersey)
- Redefine exclusions so that all "customer requested due dates" other than offered interval are excluded. (Pac Bell-California)
- Include basic POTS services evaluated as to whether they were completed within a standard number of days (e.g., completed within 3 days). (Southwestern Bell Telephone-Texas)

NEEDED IMPROVEMENTS TO MEASURE 7a, 7b, 7c: AVERAGE DELAY DAYS FOR ILEC CAUSED MISSED DUE DATES

- Include all reasons for delay, especially delays caused by lack of facilities. (Pac Bell-California, Southwestern Bell Telephone-Texas (lack of facilities only))
- Disaggregate by 1-30 days, 30-90 days, and over 90 days. (Pac Bell-California, BellSouth-Georgia)
- Include interconnection trunks in service type list. (Pac Bell-California, BellSouth-Georgia, Southwestern Bell Telephone-Texas)
- Report by region. (Pac Bell-California)

NEEDED IMPROVEMENTS TO MEASURE 9: AVERAGE RESPONSE TIME FOR LOOP MAKE-UP INFORMATION

- Include all processes ILEC uses to provide loop qualification information. (Nevada Bell-Nevada)
- Include all service types for which loop qualification may be performed (e.g., xDSL ISDN). (Nevada Bell-Nevada)

NEEDED IMPROVEMENTS TO MEASURE 10a, 10b: PERCENT MISSED REPAIR COMMITMENTS

- Change measure so interval ends when CLEC is notified that problem is closed. (Ameritech-Michigan, BellSouth-Georgia)

- Include UNEs in the service type list (PacBell-California, Ameritech-Michigan, BellSouth-Georgia)
- Break out UNEs by loop types and combinations. (Pac Bell-California)
- Break out UNE-Transport by transmission speed.
- Include troubles associated with number portability, UNE-transport, and NXX code openings. (Pac Bell-California)
- Include troubles associated with interconnection trunks. (Pac Bell-California, BellSouth-Georgia)
- When lack of parity is reported, display missed commitments by trouble type. (Pac Bell-California)

NEEDED IMPROVEMENTS TO MEASURE 11a, 11b, 11c: PERCENT REPEAT REPORTS

- Change the measurement interval to 30 days for all service types. (Pac Bell-California, Ameritech-Michigan, BellSouth-Georgia, Bell Atlantic-New York, Bell Atlantic-Pennsylvania, Bell Atlantic-New Jersey)
- Include troubles associated with number portability, unbundled transport, and NXX code openings. (Pac Bell-California)
- Include troubles associated with interconnection trunks. (Pac Bell-California, BellSouth-Georgia)
- Separately report on trouble types for Found OK, Test OK, CPE. (Bell Atlantic-New York, Bell Atlantic-Massachusetts, Bell Atlantic-Pennsylvania, Bell Atlantic-New Jersey, Bell Atlantic-Pennsylvania ALJs' recommendation)
- When lack of parity is reported, display repeated reports by all trouble type. (Pac Bell-California)

NEEDED IMPROVEMENTS TO MEASURE 12a, 12b, 12c: RECEIPT TO CLEAR DURATION/MTTR

- Change measure so interval ends when CLEC is notified that problem is closed. (Ameritech-Michigan, BellSouth-Georgia)
- Separately report on trouble types for "found ok", "test ok", and "CPE troubles". (Bell Atlantic-New York, Bell Atlantic-Massachusetts, Bell Atlantic-Pennsylvania, Bell Atlantic-New Jersey, Bell Atlantic-Pennsylvania ALJs' recommendation)

- When lack of parity is reported, display average duration by all trouble types. (Pac Bell-California)
- Include troubles associated with number portability and unbundled transport. (Pac Bell-California)
- Include troubles associated with interconnection trunks. (Pac Bell-California, BellSouth-Georgia, Southwestern Bell Telephone-Texas)
- Include NXX code openings troubles. (Pac Bell-California, Southwestern Bell Telephone-Texas)

NEEDED IMPROVEMENTS TO MEASURE 13a, 13b, 13c: TROUBLE REPORT RATE

- Include troubles associated with number portability, unbundled transport, and NXX code openings. (Pac Bell-California)
- Include troubles associated with interconnection trunks. (Pac Bell-California, BellSouth-Georgia)
- When a lack of parity is reported, display report rate by trouble type, including “found ok”, “test ok” and “CPE troubles.” (Pac Bell-California)

NEEDED IMPROVEMENTS TO MEASURE 14: AVERAGE TRUNK RESTORAL INTERVAL (SBC/Ameritech merger proposal is the only plan that does not include interconnection trunks in the “Receipt To Clear” measurement)

- Include all interconnection trunk troubles, without the SBC/Ameritech exclusions. (Pac Bell-California, Ameritech-Michigan, BellSouth-Georgia)

NEEDED IMPROVEMENTS TO MEASURE 15: PERCENT TRUNK BLOCKAGE

- Measure blockage by peak busy hour on a weekly basis.
- Measure should exclude CLEC controlled trunk groups. (Pac Bell-California)

NEEDED IMPROVEMENTS TO MEASURE 16: PERCENT PREMATURE DISCONNECT COORDINATED CUT-OVERS

- Redefine data set to include lines instead of customers. (Pac Bell-California, Ameritech-Michigan, BellSouth-Georgia, Southwestern Bell Telephone-Texas)

- Include LNP as a service type. (Pac Bell-California, Southwestern Bell Telephone-Texas, Ameritech-Michigan)
- Include all the ways coordinated cutovers can be disrupted by the ILEC, not just early cutovers. (Pac Bell-California, Southwestern Bell Telephone-Texas)
- Change measure to include success in achieving total cutover due date/time. (Pac Bell-California)
- Include all coordinated cutovers in measure, not just those associated with UNE loops. (Pac Bell-California)
- Exclude any delays caused by CLECs. (Pac Bell-California, BellSouth-Georgia)

NEEDED IMPROVEMENTS TO MEASURE 17: PERCENT MISSED COLLOCATION DUE DATES

- Include all types of collocation (augments, cageless, shared etc.). (Southwestern Bell Telephone-Texas)
- Exclude canceled orders. (Pac Bell-California, Ameritech-Michigan, BellSouth-Georgia)
- Change benchmark to 100% within 90 calendar days for new cages, 100% within 60 calendar days for virtual, and 100% within 60 calendar days for augments.

NEEDED IMPROVEMENTS TO MEASURE 18: BILLING TIMELINESS (WHOLESALE BILL)

- Disaggregate bill types by: Resale, UNEs, Facility/Interconnect. (Pac Bell-California, BellSouth-Georgia)
- Change benchmark to at least 99% within 6 calendar days. (BellSouth-Georgia)

NEEDED IMPROVEMENTS TO MEASURE 19: OSS INTERFACE AVAILABILITY

- Measure should be reported by region if the system interfaces are actually different by region (BellSouth-Georgia, Southwestern Bell Telephone-Texas)
- Increase benchmark to at least 99.5% system availability. (Southwestern Bell Telephone-Texas)

- Include all scheduled hours of OSS interface availability. (Pac Bell-California, Southwestern Bell Telephone-Texas, Ameritech-Michigan, BellSouth-Georgia)

**NEEDED IMPROVEMENTS TO MEASURE 20: COMMON TRANSPORT TRUNK
BLOCKAGE**

- Change benchmark to no more than 2%, if not 1%. (Pac Bell-California, Southwestern Bell Telephone-Texas)

ADDITIONAL MEASURES TO BE ADDED TO THE SBC/AMERITECH PROPOSAL

LINE SHARING MEASURE

- The SBC/Ameritech merger plan includes a proposed requirement for a line sharing measure. MCIW generally supports such a measure but reserves comment on the actual measure until it is defined.

PERCENT ON-TIME LOSS NOTIFICATION

- This measurement shows the elapsed time from the ILEC disconnection/transfer of service to CLEC to the time ILEC notifies CLEC that the disconnection/transfer is complete.

AVERAGE OFFERED INTERVAL

- This measurement will show if CLECs have the same opportunity to schedule a due date as the ILEC -- orders can be provisioned in the same amount of time and all on time but rarely on the date the CLEC requested. (Bell Atlantic-New York, Bell Atlantic-Pennsylvania, Bell Atlantic-New Jersey)

ORDER ACCURACY

- This metric addresses the accuracy of ILEC provisioning of CLEC orders. (Southwestern Bell Telephone-Texas, Bell Atlantic-New York, Bell-Atlantic-Pennsylvania, Bell Atlantic-New Jersey)

PERCENT REJECTS

- This measure shows the percentage of orders placed by CLECs that the ILECs reject. (Southwestern Bell Telephone-Texas, Ameritech-Michigan, BellSouth-Georgia, Bell Atlantic-New York, Bell Atlantic-Pennsylvania, Bell Atlantic-New Jersey)

REJECT INTERVAL

- This measurement shows the time it takes for ILEC systems to notify CLEC that an order has been rejected. (Southwestern Bell Telephone-Texas, Pac Bell-California, Ameritech-Michigan, BellSouth-Georgia, Bell Atlantic-New York, Bell Atlantic-Pennsylvania, Bell Atlantic-New Jersey)

JEOPARDY NOTICE INTERVAL

- This measure captures the remaining time between the pre-existing committed order completion date and time to the date and time the ILEC issues a notice to the CLEC indicating that an order may miss its due date. (Pac-Bell California, Ameritech-Michigan, Bell Atlantic-New York, Bell Atlantic Pennsylvania, Bell Atlantic-New Jersey)

PERCENT JEOPARDIES

- This measurement shows how often the ILEC notifies the CLEC in advance that an order might be missed. (Pac Bell-California, Ameritech-Michigan, Bell Atlantic-New York, Bell Atlantic-Pennsylvania, Bell Atlantic-New Jersey)

PROVISIONING TROUBLES

- This measure is necessary in order to identify the troubles, and the responsibility for troubles, that occur to a CLEC customer's service during the provisioning process. It also identifies these troubles uniquely from ILEC troubles for their retail customers. (Pac Bell-California)

AVERAGE COORDINATED CONVERSION INTERVAL

- The time between the disconnection of an access line from the switch port of the ILEC to the time the ILEC finishes both the physical work necessary to re-terminate the loop and receives CLEC confirmation that electrical continuity exists is measured here. (BellSouth-Georgia)

COMPLETIONS WITH NO NOTICE OR LESS THAN 24 HOURS NOTICE

- This measure shows when the ILEC did not give a firm order confirmation to the CLEC or provided one with little notice such that the CLEC and/or customer is not ready on the due date. (Bell Atlantic-New York, Bell Atlantic-Pennsylvania, Bell Atlantic-New Jersey)

PERCENT ORDERS CANCELED AFTER MISSED DUE DATE

- When a customer due date is not met and the customer then cancels the order, the cancellation may be a direct cause of that missed due date – especially when the due date is missed for extended periods of time. (Southwestern Bell Telephone-Texas)

PERCENT OF TIME 10-DIGIT TRIGGER IS APPLIED "X" HOURS PRIOR TO THE LNP ORDER DUE DATE

- This measure captures the percent of times a 10-digit trigger is applied by the ILEC (this trigger can help enable the smooth transition of service from ILEC to CLEC). (Southwestern Bell Telephone-Texas)

PERCENT OF ORDERS HELD >= 10/30/60 DAYS

- This measure detects orders that continue in a “non-completed” state for an extended period of time. (Southwestern Bell Telephone-Texas, Pac Bell-California, Ameritech-Michigan, BellSouth-Georgia, Bell Atlantic- New York, Bell Atlantic- Pennsylvania, Bell Atlantic-New Jersey)

MEAN TIME TO ANSWER

- Time for ILEC Agent and/or voice response unit (support center type, OS/DA) to answer the phone for CLEC and/or CLEC customer. (Southwestern Bell Telephone-Texas, Pac Bell-California, Ameritech-Michigan, BellSouth-Georgia, Bell Atlantic-New York, Bell Atlantic-Pennsylvania, Bell Atlantic-New Jersey)

CALL ABANDONMENT RATE

- This metric shows the number of phone calls where the callers hung up rather than wait for an answer because the process was taking too long. (Southwestern Bell Telephone-Texas)

AVERAGE NOTIFICATION OF INTERFACE/OSS OUTAGE-

- This measure shows the time it takes from when ILEC first learns of an OSS/interface outage to the time it takes to notify the CLEC. (Pac Bell-California, Bell Atlantic-New York, Bell Atlantic-Pennsylvania, Bell Atlantic-New Jersey)

PERCENT OF CHANGE MANAGEMENT NOTICES SENT ON-TIME

- This metric is designed to measure the percent of change management notices sent to the CLEC according to notification standards and timeframes prescribed by the parties’ Change Management Agreement. (Bell Atlantic-New York, Bell Atlantic-Pennsylvania, Bell Atlantic-New Jersey)

PERCENT SOFTWARE CERTIFICATION FAILURES

- This measure captures the number of changes required as a result of CLEC experiencing malfunctions during the execution of transactions directly related to the pre-defined conditions

in the test deck. (Bell Atlantic-New York, Bell Atlantic-Pennsylvania, Bell Atlantic-New Jersey)

PERCENT ON-TIME RESPONSE TO: BONA FIDE REQUESTS AND REQUESTS FOR ACCESS TO POLES, CONDUITS AND RIGHTS OF WAY

- This measure shows the extent to which the ILEC responds promptly to a BFR or to a request for poles, conduits and ROWs. (Southwestern Bell Telephone-Texas, Ameritech-Michigan, Bell Atlantic-New York, Bell Atlantic-Pennsylvania, Bell Atlantic-New Jersey)

PERCENT ON-TIME RESPONSE TO RESPONSE COMMITMENTS

- This measure shows the percent of times the ILEC responds promptly to any commitment the ILEC makes for billing, pre-ordering, ordering, etc.

PERCENT OF REQUESTS FOR ACCESS TO POLES, CONDUITS AND RIGHTS OF WAY REJECTED FOR LACK OF SPACE

- This measure shows when CLECs requests are rejected by an ILEC because of space limitations.

MEAN TIME TO PROVIDE DAILY USAGE FEED

- This measure captures the elapsed time between the recording of usage data generated either by CLEC retail customers or by CLEC access customers and the time when the data set is successfully transmitted in compliant format to the CLEC. (Southwestern Bell Telephone-Texas, Pac Bell-California, Ameritech-Michigan, BellSouth-Georgia, Bell Atlantic-New York, Bell Atlantic-Pennsylvania, Bell Atlantic-New Jersey)

**PERCENT USAGE ACCURACY
PERCENT INVOICE ACCURACY**

- These two measures capture the accuracy of the usage and invoice bills for completeness of content, accuracy of information and conformance of formatting. (Southwestern Bell Telephone-Texas, PacBell-California, BellSouth-Georgia, Bell Atlantic-New York, Bell Atlantic-Pennsylvania, Bell Atlantic-New Jersey)

PERCENT BILLING ERRORS CORRECTED IN X DAYS

- This measures the percent of daily usage feed billing errors that are corrected by the ILEC within a set number of days, depending on the severity level.

TIME TO PROOF DIRECTORIES

- This measures shows if the ILEC provides CLECs the same opportunity that the ILEC has to proof listings before publication. (Bell Atlantic-New York, Bell Atlantic-Pennsylvania, Bell Atlantic-New Jersey)

ILEC RESPONSE INTERVAL TO TRUNK RESIZING REQUESTS - RECIPROCAL TRUNKS -INBOUND TO CLEC

- This measures the timeliness of an ILEC's response to CLECs' requests for adequate trunk capacity. (Bell Atlantic-Pennsylvania)

MEAN TIME TO NOTIFY CLEC OF NETWORK DISRUPTIONS AND RESTORATIONS

- This measurement monitors the timeliness with which ILEC notifies CLECs of major network disruptions and restorations that impact the CLEC networks and customers. (PacBell-California, similar)

TIME TO RESPOND TO COLLOCATION REQUEST

- This measurement monitors the timeliness with which the ILEC informs the CLEC that a requested collocation option is or is not available. (Southwestern Bell Telephone-Texas similar, Pac Bell-California, BellSouth-Georgia, Bell Atlantic-New York, Bell Atlantic-Pennsylvania, Bell Atlantic-New Jersey)

TIME TO PROVIDE COLLOCATION ARRANGEMENT

- This measurement is the elapsed time from the ILEC's receipt of an order for collocation from the CLEC to the CLECs acceptance of the collocation without major exceptions. (Bell Atlantic-New York, Bell Atlantic-Pennsylvania, Bell Atlantic-New Jersey)

AVERAGE DELAY DAYS FOR MISSED COLLOCATIONS

- This measurement shows the average delay days caused by the ILEC to complete collocation facilities. (Southwestern Bell Telephone-Texas)

AVERAGE UPDATE INTERVAL E911/911 AND OS/DA

- ILECs must provide timely updates to the E911 Automatic Location Identifier and selective router databases with CLEC customer information. (Southwestern Bell Telephone-Texas, Pac Bell-California, BellSouth-Georgia)

PERCENT UPDATE ACCURACY E911/911 AND OS/DA

- This measurement concerns the accuracy of the updates to E911 databases, which is as crucial as the timeliness of the updates. (Southwestern Bell Telephone-Texas, Pac Bell-California, BellSouth-Georgia)

NXX LOADED AND TESTED PRIOR TO LERG EFFECTIVE DATE

- This measure tracks ILEC failure to load the CLEC's NXXs in ILEC switches and tandems and perform testing by the LERG (Local Exchange Routing Guide) effective date, which can delay a CLEC's switch launch or calling area expansion. (Southwestern Bell Telephone-Texas, Pac Bell-California)

AVERAGE DELAY DAYS FOR NXX LOADING AND TESTING

- This measure will detect how long it takes after the missed due date for the ILEC to load and test NXX's into its systems. (Southwestern Bell Telephone-Texas)

JEOPARDY INTERVAL FOR MAINTENANCE & REPAIR

- This is an important customer service function that enables customers to rearrange work plans to be available for the appointment. (Bell Atlantic-New York, Bell Atlantic-Pennsylvania, Bell Atlantic-New Jersey)

OUT OF SERVICE

- This measure compares how long on average CLEC customers are out of service to how long on average ILEC customers are out of service. (Southwestern Bell Telephone-Texas, Pac Bell-California, Ameritech-Michigan, BellSouth-Georgia, Bell Atlantic-New York, Bell Atlantic-Pennsylvania, Bell Atlantic-New Jersey)

ATTACHMENT 2

DETAILED ANALYSIS OF SBC/AMERITECH MERGER MEASURES, CALIFORNIA MEASURES AND AMERITECH/MICHIGAN MEASURES				
Critical Factors	SBC/Ameritech Merger Proposal, as of August 27, 1999	California OSS/OII Plan, dated September 7, 1999, and as included in the SBC/Ameritech merger proposal, dated August 27, 1999	Ameritech Michigan Plan, Case No. U-11830, order dated May 27, 1999 and September 3, 1999	Comments

Measure 1: FOC Interval				
Data Set				Formula and start/stop times are the same for all plans. For orders where a confirmation notice is not returned to the CLEC, interval should be measured using date/time when CLEC receives completion notice.
Service Types	Has several service types, including UNE-Combinations, but does not report by loop type, UNE Transport or Interconnection Trunks. Splits out by line size, which is important as plan uses benchmarks to measure performance.	Covers all the important service types and splits out loops by type. Includes UNE Combinations, Interconnection trunks and UNE-Transport. Splits out type of UNE-ports.	Has several service types, too focused on resale, too general for loops. Includes outdated INP. Includes UNE-Transport, interconnection trunks, and UNE-combinations. Unclear what the analog for UNEs is.	All major service categories should be included: resale, UNEs, including disaggregation by loop type, UNE-Transport, UNE Combinations and interconnection trunks.
Other Disaggregation	By interface type and by line sizes	By interface type Has line size limits up to projects as currently defined by PB. Measuring for projects is under development	None	All interface types should be measured, including manual. Line size is important so that projects can be measured, and so unique benchmarks can be established for the different size categories.
Exclusions	Rejects and disconnects	Projects and rejects	Rejects	Disconnects should not be excluded. Rejects should be excluded. Projects should be included.

DETAILED ANALYSIS OF SBC/AMERITECH MERGER MEASURES, CALIFORNIA MEASURES AND AMERITECH/MICHIGAN MEASURES				
Critical Factors	SBC/Ameritech Merger Proposal, as of August 27, 1999	California OSS/OII Plan, dated September 7, 1999, and as included in the SBC/Ameritech merger proposal, dated August 27, 1999	Ameritech Michigan Plan, Case No. U-11830, order dated May 27, 1999 and September 3, 1999	Comments
Parity/ Benchmarks	Electronically submitted: 5 hours: POTS 24 hours: complex LNP less than 20 lines Negotiated interval: complex LNP greater than 50 lines 48 hours: all other Manually submitted: 24 hours: POTS, complex business, LNP less than 20 lines Negotiated interval: complex LNP greater than 50 lines 48 hours: all other Benchmark: 94% within interval for complex business and UNE loop greater than 50 lines, 95% for all other.	Fully Electronic: avg. 20 minutes Electronic/ Manual: Avg. 6 hours Manual/manual avg. 12 hours	Fully Electronic: 90% in 2 hours Manual less than 10 lines: 90% in 1 business days, 3 days for greater than 10 lines	

DETAILED ANALYSIS OF SBC/AMERITECH MERGER MEASURES, CALIFORNIA MEASURES AND AMERITECH/MICHIGAN MEASURES				
Critical Factors	SBC/Ameritech Merger Proposal, as of August 27, 1999	California OSS/OII Plan, dated September 7, 1999, and as included in the SBC/Ameritech merger proposal, dated August 27, 1999	Ameritech Michigan Plan, Case No. U-11830, order dated May 27, 1999 and September 3, 1999	Comments

Measure 2. Average Response Time for OSS Pre-Order Interfaces				
Data Set	Average response time from issue of the query to return of pre-order information	Average response time from issue of the query to return of pre-order information	Average response time from issue of the query to return of pre-order information	Include all interfaces (e.g., EDI), and as new ones are implemented, begin reporting on them in 4-6 weeks
Service Type	N/A	N/A	N/A	
Other Disaggregation	Datagate and Verigate only; by major query types except facility availability and reject/failed queries. (Loop qualification is measured in #7)	Datagate, Verigate and CESAR; by major query types, including facility availability/loop qualification and reject/failed queries	By available pre-order interface; by major query types including facility availability, and reject/failed queries, except loop qualification	All major query types including facility availability/loop qualification should be reported. Interval for reject/failed queries should also be reported.
Exclusions	Only Customer Service Records (CSRs) summaries are included, not the actual record	None	None	Complete CSRs should be received for this measure, not just a CSR summary
Parity/Benchmark	Benchmark: by interface type, and query type. Generally longer than those proposed by LCUG	Benchmark for OSS interface, Parity for legacy systems (under development)	Parity (assumes retail reps use an interface)	Parity or strict benchmarks with periodic updates should be the standard

DETAILED ANALYSIS OF SBC/AMERITECH MERGER MEASURES, CALIFORNIA MEASURES AND AMERITECH/MICHIGAN MEASURES				
Critical Factors	SBC/Ameritech Merger Proposal, as of August 27, 1999	California OSS/OII Plan, dated September 7, 1999, and as included in the SBC/Ameritech merger proposal, dated August 27, 1999	Ameritech Michigan Plan, Case No. U-11830, order dated May 27, 1999 and September 3, 1999	Comments

Measure 3. Order Process Percent Flow Through				
Data Set	Percent of service requests submitted electronically via CLEC mechanized ordering process that flow through to the ILEC OSS w/out manual intervention	Percent of service requests submitted electronically via CLEC mechanized ordering process that flow through to the ILEC OSS w/out manual intervention	Percent of service requests submitted electronically via CLEC mechanized ordering process that flow through to the ILEC OSS w/out manual intervention	All of the plans use essentially the same data set, though the CA plan measure also evaluates flow through for service types specifically programmed to flow through
Service Type	By resale, UNE loops, UNE combinations, and "other" category, for those orders programmed to flow through	1. For those service group/service order types programmed to flow through 2. All electronically received service group/service order types measured in the aggregate	By Resale POTS, Resale Specials, UNes, UNE Combinations for all electronically received orders	At a minimum, measure should capture at a detailed level of service group type, total flow through for electronically received service requests. The denominator must be all service requests electronically received
Other Disaggregation	None	By interface	None	Results should be presented by interface type, as different interfaces may have different flow through rates
Exclusions	Rejected orders	None	Rejected orders	Rejected orders should be excluded
Parity/Benchmark	Parity	Diagnostic only	Parity	

DETAILED ANALYSIS OF SBC/AMERITECH MERGER MEASURES, CALIFORNIA MEASURES AND AMERITECH/MICHIGAN MEASURES				
Critical Factors	SBC/Ameritech Merger Proposal, as of August 27, 1999	California OSS/OII Plan, dated September 7, 1999, and as included in the SBC/Ameritech merger proposal, dated August 27, 1999	Ameritech Michigan Plan, Case No. U-11830, order dated May 27, 1999 and September 3, 1999	Comments

Measure 4a,4b,4c: Percent ILEC Caused Missed Due Dates				
Data Set	For Resale POTS and basic UNE loops, measure based on orders. For resale specials and all other UNEs, measure based on circuits.	Measure is based on orders.	Measure is based on orders.	Formula and start/stop times are essentially the same for all plans. The interval should capture end time as when completion notice is sent to CLEC, not when order is noted as complete in ILEC provisioning system. Measure should be based on orders, not circuits.
Service Types	Includes resale and UNE services (including UNE-Transport), but does not include interconnection trunks	Includes most resale, UNEs and interconnection trunks. Doesn't break out UNE Transport speeds	Has several service types, too focused on resale, too general for loops. Includes outdated INP. Includes UNE-Transport, interconnection trunks, and UNE-combinations. Unclear what the analog for UNEs is.	All major service categories should be included: resale, UNEs, including disaggregation by loop type, UNE-Transport, UNE Combinations and interconnection trunks.
Other Disaggregation	Field Work/No Field Work for Resale POTS and UNE Combinations	Region, Field Work/No Field Work	Field Work/No Field Work	Reporting by region may be valuable. Reporting by Field Work/No Field Work is valuable.
Exclusions	Orders that are not N, T, C, customer caused misses, Interconnection trunks	Canceled orders, customer caused misses, and disconnect orders	Canceled service orders, and customer caused misses	Canceled orders, customer caused misses, and disconnect orders should be excluded.
Parity/Benchmark	Parity	Parity	Parity	

DETAILED ANALYSIS OF SBC/AMERITECH MERGER MEASURES, CALIFORNIA MEASURES AND AMERITECH/MICHIGAN MEASURES				
Critical Factors	SBC/Ameritech Merger Proposal, as of August 27, 1999	California OSS/OII Plan, dated September 7, 1999, and as included in the SBC/Ameritech merger proposal, dated August 27, 1999	Ameritech Michigan Plan, Case No. U-11830, order dated May 27, 1999 and September 3, 1999	Comments

Measure 4d: Percent Mechanized Completions Returned within 1 Day of Work Completion				
Data Set	Mechanized completions only, measured from work completion date to return of completion notice	All completions measured from order completion date/time to return of completion notice date/time	All completions measured from work completion date/time to return of completion notice date/time	Manual completions should be included as well as mechanized. Start time of measure should be when work is completed.
Service Types	N/A	N/A	By service types (9)	Service type is not relevant to completion notice
Other Disaggregation	By electronic interface	By all interfaces	By dispatch and no dispatch	All completion types need to be measured. Interface type dictates the completion notice interval.
Exclusions	None	None	None	There should be no exclusions.
Parity/Benchmarks	97% within 1 day	Fully Electronic: Avg., 20 minutes All other 90% within 24 hours** ** after ILEC systems are updated	95% within 2 hours* * no ILEC system updates	The ILEC process should be to notify CLEC of work completion before ILEC updates its systems. Notice of completion should occur in real time.

DETAILED ANALYSIS OF SBC/AMERITECH MERGER MEASURES, CALIFORNIA MEASURES AND AMERITECH/MICHIGAN MEASURES				
Critical Factors	SBC/Ameritech Merger Proposal, as of August 27, 1999	California OSS/OII Plan, dated September 7, 1999, and as included in the SBC/Ameritech merger proposal, dated August 27, 1999	Ameritech Michigan Plan, Case No. U-11830, order dated May 27, 1999 and September 3, 1999	Comments

Measure 5a, 5b, 5c: Percent of Trouble Reports within 10 (30) Days of Installation				
Data Set	Trouble reports received within 10 days for POTS and 30 days for all other services	Trouble reports received within 30 days	Trouble reports received within 30 days	The longer the period, the more troubles will be reported as part of the install process
Service Types	Includes resale and UNE services, but does not include interconnection trunks	Includes most resale, UNEs and interconnection trunks. Does not break out UNE Transport speeds	Has several service types, too focused on resale, too general for loops. Includes outdated INP. Does include UNE-Transport, interconnection trunks, and UNE-combinations. Unclear what the analog for UNEs is.	All major service categories should be included: resale, UNEs, including disaggregation by loop type, UNE-Transport, UNE Combinations, interconnection trunks, and number portability.
Other Disaggregation	Field Work/No Field Work	Region, Field Work/No Field Work, and trouble type if parity not achieved	None	Reporting by region is valuable. Reporting by Field Work/No Field Work is valuable
Exclusions	Subsequent reports, customer caused troubles, trouble reports received on the due date, interconnection trunks, inside wire, and disconnect orders	Subsequent reports, customer caused troubles, trouble reports received on the due date, and employee reports	None	Troubles on interconnection trunks and employee reports should not be excluded. Although the other plans don't specifically mention certain exclusions, some are implied
Parity/Benchmark	Parity	Parity	Parity	Parity is the appropriate comparison for this measure

DETAILED ANALYSIS OF SBC/AMERITECH MERGER MEASURES, CALIFORNIA MEASURES AND AMERITECH/MICHIGAN MEASURES				
Critical Factors	SBC/Ameritech Merger Proposal, as of August 27, 1999	California OSS/OII Plan, dated September 7, 1999, and as included in the SBC/Ameritech merger proposal, dated August 27, 1999	Ameritech Michigan Plan, Case No. U-11830, order dated May 27, 1999 and September 3, 1999	Comments

Measure 6a, 6b, 8: Mean Installation Interval				
Data Set	Receipt of valid service request to order completion date	Receipt of valid service request to order completion date	Receipt of valid service request to return of completion notice	Measure should capture interval up to, and including, return of completion notice. The interval should capture end time as when completion notice is sent to CLEC, not when order is noted as complete in ILEC provisioning system
Service Types	Includes resale. Does not include UNE services, including UNE-transport or interconnection trunks	Includes most resale, UNEs and interconnection trunks. Does not break out UNE Transport speeds	Has several service types, too focused on resale, too general for loops. Includes outdated INP. Does include UNE-Transport, interconnection trunks, and UNE-P. Unclear what the analog for UNEs is.	All major service categories should be included: resale, UNEs, including disaggregation by loop type, UNE-Transport, UNE Combinations and interconnection trunks.
Other Disaggregation	Field Work/No Field Work for Resale POTS and UNE Combinations	Region, Field Work/No Field Work	Field Work/No Field Work	Reporting by region is valuable. Reporting by Field Work/No Field Work is valuable.
Exclusions	Customer misses, disconnects, customer requested due dates greater than 5 days for POTS, greater than 20 days for Specials, etc.	Customer caused delays, customer requested due dates other than the offered interval	Customer caused misses	Although not explicit, canceled orders and disconnects are implied in all of the plans. All customer requested due dates other than the offered interval should be excluded, including those due dates less than 5 days for POTS, and those less than 20 days for Specials.
Parity/Benchmark	Parity	Parity	Parity	Parity is the appropriate comparison for this measure

DETAILED ANALYSIS OF SBC/AMERITECH MERGER MEASURES, CALIFORNIA MEASURES AND AMERITECH/MICHIGAN MEASURES				
Critical Factors	SBC/Ameritech Merger Proposal, as of August 27, 1999	California OSS/OII Plan, dated September 7, 1999, and as included in the SBC/Ameritech merger proposal, dated August 27, 1999	Ameritech Michigan Plan, Case No. U-11830, order dated May 27, 1999 and September 3, 1999	Comments

Measure 6c: Percent Installations Completed in X Days				
Data Set	Percent of installations complete within X business days from receipt of valid service request to order completion	Percent of installations complete within X business days from receipt of valid service request to order completion	N/A	For service types with standard interval, this measure assesses completion rate within that standard interval.
Service Type	Only includes UNE services, and does not include resale specials (which have standard intervals) and interconnection trunks	Includes most resale, UNEs and interconnection trunks. Does not break out UNE Transport speeds. Excludes POTS which have a flexible due date.	N/A	All services with standard due date should be measured. For services with flexible due dates, a measure should be established to assess percent completed within some reasonable interval.
Other Disaggregation	None	Region	N/A	Reporting by region is valuable.
Exclusions	Customer caused misses, disconnects, customer requested due dates greater than offered interval, Specials and Interconnection trunks	Customer caused misses, disconnects, customer requested due dates longer than offered interval, flexible due date	N/A	Specials and Interconnection trunks should not be excluded. All customer requested due dates other than the offered interval should be excluded. Flexible due date should be excluded since by definition they do not have a standard interval. However, a measure is needed to report on them.
Parity/Benchmark	Benchmark 95% within X days	Parity	N/A	

DETAILED ANALYSIS OF SBC/AMERITECH MERGER MEASURES, CALIFORNIA MEASURES AND AMERITECH/MICHIGAN MEASURES				
Critical Factors	SBC/Ameritech Merger Proposal, as of August 27, 1999	California OSS/OII Plan, dated September 7, 1999, and as included in the SBC/Ameritech merger proposal, dated August 27, 1999	Ameritech Michigan Plan, Case No. U-11830, order dated May 27, 1999 and September 3, 1999	Comments

Measure 7a, 7b, 7c: Delayed Days to Missed Due Dates				
Data Set	Calendar day from due date to completion date on ILEC missed orders, excludes orders delayed due to lack of facilities	Calendar day from due date to completion date on ILEC missed orders, excludes orders held for reasons other than lack of facilities; also has a measure for "held order interval", which includes all held orders regardless of reason	Average interval of all pending orders held past the completion date	Most orders are delayed due to lack of facilities. The measure should include delayed orders for any reason. The interval should capture end time as when completion notice is sent to CLEC, not when order is noted as complete in ILEC provisioning system
Service Types	Includes resale and UNE services, but does not include interconnection trunks	Includes most resale, UNEs and interconnection trunks. Does not break out UNE-transport by speeds.	Has several service types, too focused on resale, too general for loops. Includes outdated INP. Does include UNE-Transport, interconnection trunks, and UNE-combinations. Unclear what the analog for UNEs is.	All major service categories should be included: resale, UNEs, including disaggregation by loop type, UNE-Transport, UNE Combinations and interconnection trunks.
Other Disaggregation	None	By 1-30 days, 30-90 days, and over 90 days	Over 15 days, and over 90 days	Reporting by region is valuable.
Exclusions	Customer caused delays disconnects, delayed orders due to lack of facilities, interconnection trunks	Customer caused delays, delays due to reasons other than lack of facilities	Canceled orders	Orders held due to lack of facilities should not be excluded. Customer caused delays should be excluded.

DETAILED ANALYSIS OF SBC/AMERITECH MERGER MEASURES, CALIFORNIA MEASURES AND AMERITECH/MICHIGAN MEASURES				
Critical Factors	SBC/Ameritech Merger Proposal, as of August 27, 1999	California OSS/OII Plan, dated September 7, 1999, and as included in the SBC/Ameritech merger proposal, dated August 27, 1999	Ameritech Michigan Plan, Case No. U-11830, order dated May 27, 1999 and September 3, 1999	Comments
Parity/ Benchmark	Parity	Parity	Parity, however, no comparison for UNEs and interconnection trunks	All services must be measured using parity standard

DETAILED ANALYSIS OF SBC/AMERITECH MERGER MEASURES, CALIFORNIA MEASURES AND AMERITECH/MICHIGAN MEASURES				
Critical Factors	SBC/Ameritech Merger Proposal, as of August 27, 1999	California OSS/OII Plan, dated September 7, 1999, and as included in the SBC/Ameritech merger proposal, dated August 27, 1999	Ameritech Michigan Plan, Case No. U-11830, order dated May 27, 1999 and September 3, 1999	Comments

Measure 9. Average Response Time for Loop Make-Up Information (This measure only exists in the SBC/AIT merger proposal)				
Data Set	Average time required to provide loop qualification information for ADSL	N/A	N/A	Should include all processes ILEC uses to provide loop qualification information
Service Type	ADSL, or other DSL as determined by PUC of Texas	N/A	N/A	Results should be provided by all service types that use the facilities qualification process. States should not be limited by the PUC of Texas
Other Disaggregation	None	N/A	N/A	Results should be by qualification process if more than one exists
Exclusions	None	N/A	N/A	
Parity/Benchmark	Parity	N/A	N/A	Standard should be parity, unless no analogous process exists, in which case strict benchmarks with periodic updates should be used.

DETAILED ANALYSIS OF SBC/AMERITECH MERGER MEASURES, CALIFORNIA MEASURES AND AMERITECH/MICHIGAN MEASURES				
Critical Factors	SBC/Ameritech Merger Proposal, as of August 27, 1999	California OSS/OII Plan, dated September 7, 1999, and as included in the SBC/Ameritech merger proposal, dated August 27, 1999	Ameritech Michigan Plan, Case No. U-11830, order dated May 27, 1999 and September 3, 1999	Comments

Measure 10a, 10b. Percent Missed Repair Commitments				
Data Set	Measures 'receipt to clear'	Measures 'receipt to clear'	Measures "receipt to close"	"Receipt to close" is preferable over 'receipt to clear'. LCUG, FCC NPRM and Michigan plan all state that measure should include "notice to CLEC" that problem has been closed.
Service Type	Includes only Resale POTS, Basic UNE Loop with test access, and UNE Basic Combination.	Includes most resale, UNEs, LNP, Unbundled Transport, interconnection trunks, NXX Code Openings.	Has several service types. Too focused on resale, too general for loops. Includes outdated INP. Does include UNE-Transport, interconnection trunks, and UNE-combinations. Unclear what the analog for UNEs is.	All major service categories should be included: resale, UNEs, including disaggregation by loop type, UNE-Transport, UNE Combinations, and interconnection trunks. There should also be disaggregation for NXX code opening troubles and number portability troubles
Other Disaggregation	None	Trouble types, if a lack of parity, dispatch/No dispatch	Dispatch/No Dispatch	Should be disaggregated by trouble type and dispatch/no dispatch. Reporting by region is valuable.
Exclusions	Customer caused troubles	CPE/customer caused troubles, canceled troubles, and subsequent reports	Canceled troubles	Appropriate exclusions are CPE and customer caused troubles, canceled troubles, and subsequent reports
Parity/Benchmark	Parity	Parity	Parity	Parity is the appropriate standard for this measure

DETAILED ANALYSIS OF SBC/AMERITECH MERGER MEASURES, CALIFORNIA MEASURES AND AMERITECH/MICHIGAN MEASURES				
Critical Factors	SBC/Ameritech Merger Proposal, as of August 27, 1999	California OSS/OII Plan, dated September 7, 1999, and as included in the SBC/Ameritech merger proposal, dated August 27, 1999	Ameritech Michigan Plan, Case No. U-11830, order dated May 27, 1999 and September 3, 1999	Comments

Measure 11a, 11b, 11c. Percent Repeat Reports				
Data Set	Trouble reports received within 10 days for POTS and 30 days for all other services	Trouble reports received within 30 days	Trouble reports received within 30 days	The longer the period the more troubles will be captured in the results
Service Type	Includes resale and UNE services, but does not include interconnection trunks	Includes most resale, UNEs, LNP, Unbundled Transport, interconnection trunks, NXX Code Openings.	Has several service types. Too focused on resale, too general for loops. Includes outdated INP. Does include UNE-Transport, interconnection trunks, and UNE-combinations. Unclear what the analog for UNEs is.	All major service categories should be included: resale, UNEs, including disaggregation by loop type, UNE-Transport, UNE Combinations, and interconnection trunks. There should also be disaggregation for NXX code opening troubles and number portability troubles
Other Disaggregation	None	Trouble types, if a lack of parity	Dispatch/No Dispatch	Should be disaggregated by trouble type if lack of parity exists. Reporting by region is valuable.
Exclusions	CPE/customer caused troubles, subsequents, and inside wire	CPE/customer caused troubles, subsequent reports, inside wire, employee generated reports	Canceled troubles, subsequent reports	Appropriate exclusions are CPE/ customer caused troubles, canceled troubles, and subsequents. Inside wire and employee generated reports should not be excluded
Parity/ Benchmark	Parity	Parity	Parity	Parity is the appropriate standard for this measure

DETAILED ANALYSIS OF SBC/AMERITECH MERGER MEASURES, CALIFORNIA MEASURES AND AMERITECH/MICHIGAN MEASURES				
Critical Factors	SBC/Ameritech Merger Proposal, as of August 27, 1999	California OSS/OII Plan, dated September 7, 1999, and as included in the SBC/Ameritech merger proposal, dated August 27, 1999	Ameritech Michigan Plan, Case No. U-11830, order dated May 27, 1999 and September 3, 1999	Comments

Measure 12a, 12b, 12c. Receipt To Clear Duration				
Data Set	Measures 'receipt to clear"	Measures 'receipt to clear"	Measures" receipt to close"	"Receipt to close" is preferable over 'receipt to clear". LCUG, FCC NPRM and Michigan plan all state that measure should include notice to CLEC that problem has been closed.
Service Type	Includes resale and UNE services. Has a separate measure for interconnection trunks (measure #14)	Includes most resale, UNEs, LNP, Unbundled Transport (but not by speed), interconnection trunks, NXX Code Openings.	Has several service types. Too focused on resale, too general for loops. Includes outdated INP. Does include UNE-Transport, interconnection trunks, and UNE-combinations. Unclear what the analog for UNEs is.	All major service categories should be included: resale, UNEs, including disaggregation by loop type, UNE-Transport, UNE Combinations, and interconnection trunks. There should also be disaggregation for NXX code opening troubles and number portability troubles. UNE-Transport should be disaggregated by speed.
Other Disaggregation	None	Trouble types, if a lack of parity	Dispatch/No Dispatch	Should be disaggregated by trouble type. Reporting by region is valuable.
Exclusions	CPE/customer caused troubles, and subsequents, no access, and customer delayed maintenance time.	CPE/customer caused troubles, subsequent reports, employee generated reports	Canceled troubles, subsequent reports	Appropriate exclusions are CPE/ customer caused troubles, canceled troubles, and subsequent reports. Employee generated reports should be included
Parity/Benchmark	Parity	Parity	Parity	Parity is the appropriate standard for this measure

DETAILED ANALYSIS OF SBC/AMERITECH MERGER MEASURES, CALIFORNIA MEASURES AND AMERITECH/MICHIGAN MEASURES				
Critical Factors	SBC/Ameritech Merger Proposal, as of August 27, 1999	California OSS/OII Plan, dated September 7, 1999, and as included in the SBC/Ameritech merger proposal, dated August 27, 1999	Ameritech Michigan Plan, Case No. U-11830, order dated May 27, 1999 and September 3, 1999	Comments

Measure 13a, 13b, 13c. Trouble Report Rate				
Data Set				Each of the plans includes initial and repeat troubles, including installation reports.
Service Type	Includes resale and UNE services, but does not include interconnection trunks	Includes most resale, UNEs, LNP, Unbundled Transport, interconnection trunks, NXX Code Openings.	Has several service types. Too focused on resale, too general for loops. Includes outdated INP. Does include UNE-Transport, interconnection trunks, and UNE-combinations. Unclear what the analog for UNEs is.	All major service categories should be included: resale, UNEs, including disaggregation by loop type, UNE-Transport, UNE Combinations, and interconnection trunks. There should also be disaggregation for NXX code opening troubles and number portability troubles
Other Disaggregation	None	If lack of parity, all troubles by trouble type are displayed, including "% found OK", "Test OK", and "CPE."	Dispatch/No Dispatch	Should be disaggregated by trouble type. To ensure CLECs are not disadvantaged in error reporting, when a lack of parity is reported, display report rate by trouble type, including "% found OK", "Test OK" and "CPE troubles." Reporting by region is valuable.
Exclusions	CPE/Customer caused troubles, and inside wire	CPE/Customer caused troubles, canceled troubles, subsequents, employee generated reports	Canceled troubles, subsequent reports	Appropriate exclusions are CPE/ customer caused troubles, canceled troubles and subsequent reports. Employee generated reports should not be excluded
Parity/Benchmark	Parity	Parity	Parity	Parity is the appropriate comparison for this measure

DETAILED ANALYSIS OF SBC/AMERITECH MERGER MEASURES, CALIFORNIA MEASURES AND AMERITECH/MICHIGAN MEASURES				
Critical Factors	SBC/Ameritech Merger Proposal, as of August 27, 1999	California OSS/OII Plan, dated September 7, 1999, and as included in the SBC/Ameritech merger proposal, dated August 27, 1999	Ameritech Michigan Plan, Case No. U-11830, order dated May 27, 1999 and September 3, 1999	Comments

Measure 14. Average Trunk Restoral Interval (PB-CA and AIT-MI plans include this as a sub-measure in measure #12)				
Data Set	Average time to restore	N/A	N/A	Include all interconnection trunk troubles
Service Types	Interconnection trunks, tandem and non-tandem	N/A	N/A	
Other Disaggregation	Tandem trunk groups, Non-tandem trunk groups, region	N/A	N/A	
Exclusions	Any trunk group troubles where less than 20% of the trunk group is out of service and there is no blockage	N/A	N/A	This measure has several exclusions which are not appropriate
Parity/ Benchmark	Tandem trunk groups: 1 hour Non-tandem trunk groups: 2 hours	N/A	N/A	

DETAILED ANALYSIS OF SBC/AMERITECH MERGER MEASURES, CALIFORNIA MEASURES AND AMERITECH/MICHIGAN MEASURES				
Critical Factors	SBC/Ameritech Merger Proposal, as of August 27, 1999	California OSS/OII Plan, dated September 7, 1999, and as included in the SBC/Ameritech merger proposal, dated August 27, 1999	Ameritech Michigan Plan, Case No. U-11830, order dated May 27, 1999 and September 3, 1999	Comments

Measure 15. Percent Trunk Blockage				
Data Set	Percent call blocked on outgoing traffic	Percent of dedicated trunk groups exceeding 2% blockage	Percent call blocked on outgoing traffic	All of the plans use essentially the same data set.
Service Type	Interconnection trunks from ILEC end office to CLEC end office, and ILEC tandem to CLEC end office	Interconnection trunks (e.g., EAS, toll, interLATA, 911) from ILEC end office to CLEC end office, and ILEC tandem to CLEC end office	By interconnection trunk	Important to measure by end office and tandem trunks separately.
Other Disaggregation	By region	By switch	None	Disaggregation by region and/or switch may be useful
Exclusions	For CLEC controlled trunks, exclusions apply if CLECs have trunks busied out, have network problems, do not turn up trunks on the due date, do not take action on TGSR, do not provide a forecast, or usage on trunk group is 25% over forecast	Measured only where ILEC controls trunk capacity	None	Measure should exclude trunk groups where CLEC actions significantly contribute to blockage
Parity/ Benchmark	Benchmark: Dedicated trunk group not too exceed 1%	Parity	Parity	

DETAILED ANALYSIS OF SBC/AMERITECH MERGER MEASURES, CALIFORNIA MEASURES AND AMERITECH/MICHIGAN MEASURES				
Critical Factors	SBC/Ameritech Merger Proposal, as of August 27, 1999	California OSS/OII Plan, dated September 7, 1999, and as included in the SBC/Ameritech merger proposal, dated August 27, 1999	Ameritech Michigan Plan, Case No. U-11830, order dated May 27, 1999 and September 3, 1999	Comments

Measure 16. Percent Pre-mature Disconnects (Coordinated Cutovers)				
Data Set	Customers disconnected prior to scheduled conversion	Coordinated conversion orders completed on scheduled date/time	Interval required by ILEC to disconnect loop and connect it to CLEC facilities	SBC/AIT merger measure only includes early cutovers and customers disconnected, not lines. Michigan plan does not evaluate whether coordinated cut completes as scheduled, just how long it takes to cut each line. The CA plan measure evaluates how often the overall scheduled due date/time is met.
Service Type	UNE Loop with and without INP	Residential Business LNP	UNE loops with and without NP	All measures except the CA plan measure are limited to cutovers involving UNE loop and UNE combos. SBC/AIT merger measure is additionally limited to just loops with and without INP.
Other Disaggregation	None	None	None	
Exclusions	None	None	CLEC caused delays and UNE loop where there is no existing subscriber loop	CLEC caused delays should be either excluded in the formula of the measure, or a specific exclusion. The SBC/AIT merger measure would be improved with this exclusion.
Parity/Benchmark	Benchmark: 2% or less premature disconnects starting 10 minutes before scheduled time	Parity (measured at no more than one hour after scheduled due time)	Benchmark: 95% within 1 hour	Michigan's benchmark would allow an individual line to be out of service as long as one hour.

DETAILED ANALYSIS OF SBC/AMERITECH MERGER MEASURES, CALIFORNIA MEASURES AND AMERITECH/MICHIGAN MEASURES				
Critical Factors	SBC/Ameritech Merger Proposal, as of August 27, 1999	California OSS/OII Plan, dated September 7, 1999, and as included in the SBC/Ameritech merger proposal, dated August 27, 1999	Ameritech Michigan Plan, Case No. U-11830, order dated May 27, 1999 and September 3, 1999	Comments

Measure 17. Percent Missed Collocation Due Dates				
Data Set	Percent missed due dates for collocation arrangements	Percent missed due dates for collocation arrangements	Percent missed due dates for collocation arrangements	All of the plans use essentially the same data set.
Service Type	Physical, virtual, cageless and additions	All collocation, by new and augment	Physical and virtual	"All collocation" should include shared and cageless. Important to split out augments.
Other Disaggregation	None	None	None	
Exclusions	Customer delays	Orders canceled	Orders canceled	If not implied, canceled orders and CLEC requested delays should be excluded.
Parity/ Benchmark	Benchmark: 95% w/in due date	Benchmark: <ul style="list-style-type: none"> New: 100% w/in tariffed interval. Augments: 100% w/in 80 calendar days 	Benchmark: <ul style="list-style-type: none"> Physical: 95% w/in 99 calendar days Virtual: 95% w/in 63 calendar days 	Benchmarks should be set at 100%, and the interval should be significantly shorter than ILEC tariffed interval

DETAILED ANALYSIS OF SBC/AMERITECH MERGER MEASURES, CALIFORNIA MEASURES AND AMERITECH/MICHIGAN MEASURES				
Critical Factors	SBC/Ameritech Merger Proposal, as of August 27, 1999	California OSS/OII Plan, dated September 7, 1999, and as included in the SBC/Ameritech merger proposal, dated August 27, 1999	Ameritech Michigan Plan, Case No. U-11830, order dated May 27, 1999 and September 3, 1999	Comments

Measure 18. Billing Timeliness (Wholesale Bill)				
Data Set	Elapsed number of days between scheduled close of bill cycle and ILEC's successful transmission of associated invoice	Elapsed number of days between scheduled close of bill cycle and ILEC's successful transmission of associated invoice	Elapsed number of days between scheduled close of bill cycle and ILEC's successful transmission of associated invoice	All of the plans have essentially the same data set.
Service Type	None	Resale, UNEs, Facility/ Interconnection	Resale, UNEs	Important to disaggregate by service type to identify problems with one type of billing element.
Other Disaggregation	None	None	None	Disaggregation by billing system may be valuable
Exclusions	None	None	None	
Parity/ Benchmark	Benchmark: 95% w/in 6 business days	Benchmark: 99% w/in 10 calendar days	Benchmark: Resale: 98% w/in 12 calendar days UNE: 98% w/in 6 calendar days	

DETAILED ANALYSIS OF SBC/AMERITECH MERGER MEASURES, CALIFORNIA MEASURES AND AMERITECH/MICHIGAN MEASURES				
Critical Factors	SBC/Ameritech Merger Proposal, as of August 27, 1999	California OSS/OII Plan, dated September 7, 1999, and as included in the SBC/Ameritech merger proposal, dated August 27, 1999	Ameritech Michigan Plan, Case No. U-11830, order dated May 27, 1999 and September 3, 1999	Comments

Measure 19. OSS Interface Availability				
Data Set	Percent of time OSS is available compared to scheduled availability	Percent of time OSS is available compared to scheduled availability	Percent of time OSS is available compared to scheduled availability	All plans use the same data set, but not all define "scheduled availability" in the same way. "Scheduled availability" should be defined as the hours the system is available, not available hours for the ILEC business offices
Service Type	N/A	N/A	N/A	
Other Disaggregation	By interface type, except (Remote Access Facility) RAF (e.g., firewall), which is measured by individual CLEC	By interface type	By interface type	All OSS functions should be included, as well as by interface type. Measurement of the RAF is a good addition. Region is important if the system interfaces are actually different by region
Exclusions	Excludes some hours but unclear what they are	None	None	All actual and scheduled system available hours should be included.
Parity/ Benchmark	Benchmark: 99%	Benchmark: 99.25%	Benchmark: 99%	Parity or a strict benchmark (with periodic updates) may be used.

DETAILED ANALYSIS OF SBC/AMERITECH MERGER MEASURES, CALIFORNIA MEASURES AND AMERITECH/MICHIGAN MEASURES				
Critical Factors	SBC/Ameritech Merger Proposal, as of August 27, 1999	California OSS/OII Plan, dated September 7, 1999, and as included in the SBC/Ameritech merger proposal, dated August 27, 1999	Ameritech Michigan Plan, Case No. U-11830, order dated May 27, 1999 and September 3, 1999	Comments

Measure 20. Common Transport Trunk Blockage				
Data Set	Percent of local common transport trunk groups exceeding 2% blockage	Percent of local common transport trunk groups exceeding 2% blockage	Percent call blocked on outgoing traffic	Either approach – percent of trunk groups with x% blockage, or percent calls blocked – is valid, although percent of calls accommodates small number of trunk groups.
Service Type	Local common transport trunk groups: <ul style="list-style-type: none"> Where CLECs share ILEC trunks CLEC only common trunks 	Common shared transport trunk groups	Common trunks	To the degree there are “CLEC only” common trunk groups, results for them should be reported separately
Other Disaggregation	Region	By trunk group type (e.g., EAS, toll, interLATA, 911) and by switch	None	Disaggregation for the CA plan measure may be excessive
Exclusions	None	None	None	
Parity/Benchmark	Benchmark: 3%	Benchmark: 2%	Parity	Minimum service standards are necessary. Parity standard does not necessarily ensure adequate service to CLECs.